

DEASEY MAHONEY
& VALENTINI LTD
ATTORNEYS AT LAW

FRANCIS J. DEASEY
HARRY G. MAHONEY
GERALD J. VALENTINI‡
HENRI MARCEL†
JOHN P. MORGENSTERN†
ANDREW B. ADAIR
MATTHEW J. JUNK†
ATHENA O. PAPPAS†
RUFUS A. JENNINGS
BRIAN C. LEGROW‡
MICHAEL P. RAUSCH†

LAUREN M. STEINS†
LEANNA B. RUOTANEN†□
BRIAN M. PÉREZ†‡
CHRISTINE D. STEERE†
CHRYSTALE B. HEWITT†
FRANK P. MENAQUALE, JR.†
MICHAEL A. KINIRY
EDWARD J. HENRY†
MATTHEW R. MELLON
DANIEL S. GRADWOHL†

† ALSO MEMBER NJ BAR
‡ ALSO MEMBER CA BAR
□ ALSO MEMBER GA BAR
◇ ALSO MEMBER DE BAR
♣ ALSO MEMBER TX BAR

SUITE 3400
1601 MARKET STREET
PHILADELPHIA, PA 19103-2301
215-587-9400
FACSIMILE: 215-587-9456
WWW.DMVLAWFIRM.COM

DIRECT EMAIL: MJUNK@DMVLAWFIRM.COM
VOICE-MAIL EXTENSION #1172

OF COUNSEL:

FRANK C. BENDER
WILLIAM A. RUBERT†
GEORGE R. ZACHARKOW†
WARD A. RIVERS†
CHRISTOPHER C. NEGRETE
PENELOPE B. O'CONNELL†

NEW JERSEY OFFICE
923 HADDONFIELD ROAD, SUITE 300
CHERRY HILL, NJ 08002
856-429-6331
FACSIMILE: 856-429-6562

MEDIA OFFICE
SUITE 101
103 CHESLEY DRIVE
MEDIA, PA 19063
610-892-2732
FACSIMILE: 215-587-9456

February 25, 2020

VIA ECF ONLY

Attn: Clerk

United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

**Re: In Re Motion To Compel Compliance With Rule 45 Subpoena Issued To
Ethicare Advisors, Inc.
Case No. 2:20-cv-01886-WJM-MF**

Dear Sir or Madam:

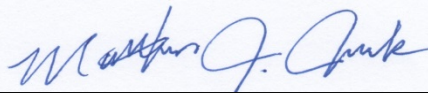
Please be advised this office represents Respondent Ethicare Advisors, Inc. with regard to the above referenced matter.

Plaintiffs filed a *Motion to Compel Compliance With Rule 45 Subpoena* (Dkt. 1) currently returnable March 16, 2020 before the Honorable William J. Martini, U.S.D.J. Pursuant to L. Civ. R. 6.1(b), Respondent requests that a 14-day response extension be granted. The original response date is March 2, and thus the response date has not expired. No prior request has been made nor granted, and opposing counsel has agreed to this extension. An application seeking the extension also has been filed in support of this request.

Very truly yours,

DEASEY, MAHONEY & VALENTINI, LTD.

By



Matthew J. Junk, Esquire

cc (via email): Jeffrey A. Carr
 Jason J. Moreira
 PEPPER HAMILTON LLP
 301 Carnegie Center, Suite 400 Princeton, NJ 08543

Jennifer S. Lewin
KING & SPALDING LLP
1180 Peachtree Street N.E.
Atlanta, GA 30309-3521
Attorneys for Plaintiff